

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of

Modifying Renewal Dates for  
Certain Stations Licensed  
Under Part 74 of the  
Commission's Rules; and

Revising FCC Form 303-S, Application  
for Renewal of License for Commercial  
and Noncommercial AM, FM or TV  
Broadcast Station

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) MM Docket No. 92-168  
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To: The Commission

COMMENTS OF CENTRAL VIRGINIA  
EDUCATIONAL TELECOMMUNICATIONS CORPORATION

Central Virginia Educational Telecommunications Corporation ("CVETC"), by its attorneys, hereby submits its comments in support of the Commission's proposal in MM Docket No. 92-168 to modify certain rules regarding the renewal of licenses for TV translators and FCC Form 303-S.<sup>1</sup>

I. Statement of Interest

CVETC is dedicated to serving the educational and informational needs of Virginia. The corporation was established in 1963 for the purpose of providing instructional television to classrooms in Central Virginia, and in 1967, expanded its operations to include public broadcasting for general audiences. Currently, CVETC operates five full power television stations, one radio

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<sup>1</sup> CVETC does not hold any licenses for LPTV facilities or FM translators, therefore, its comments are directed towards the Commission's proposals with respect to TV translators only.

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station and fifteen TV translators in Virginia.<sup>2</sup> Also, CVETC's extensive microwave facilities serve as the network control center for public television stations throughout Virginia. With these facilities, CVETC provides educational and informational video programming services to an estimated six million people.

## II. CVETC Supports the Commission's Proposed Modifications.

The Commission proposes two significant modifications to the renewal process for TV translators. First, the renewal dates for translators would be changed to correspond to that of full power stations in the same state. Second, Form 303-S would be modified to permit licensees to use a single application form to renew the licenses for full power stations and commonly owned translators that have the same renewal date.<sup>3</sup> CVETC enthusiastically supports these changes.

CVETC agrees with the Commission's findings that the proposed modifications will reduce the administrative burden to licensees and the Commission, and will yield positive

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<sup>2</sup> CVETC is the licensee of WCVE-TV, Richmond; WCVW-TV, Richmond; WNVN-TV, Goldvein; WNVN-TV, Fairfax; WHTJ-TV, Charlottesville; and WCVE-FM, Richmond, Virginia. The translators are W75AI, Nelson; W60BM and W78AG, Rustburg; W71AH and W73AJ, Centerville; W66BI and W83AJ, Danville; W77AE and W79AT, Mecklenburg; W73AS and W75AP, Oak Grove; W74AU and W76AN, Cobbs Creek; W79AX, Heathsville, and W39AK, Wintergreen, Virginia.

<sup>3</sup> Notice of Proposed Rule Making, MM Docket No. 92-168, rel. Aug. 4, 1992, at 1 ("Notice").

public interest benefits.<sup>4</sup> As a noncommercial educational licensee, CVETC constantly strives to improve its operations in order to provide Virginia residents with the highest quality public programming through the most efficient means possible. Conforming filing dates and permitting licensees to file for renewal under one form will reduce CVETC's costs, and make more of CVETC's resources available for providing quality programming. Thus, the Commission's proposals will assist CVETC in reaching its goal of maximizing the value of the contributions it receives from the public.

Further, the Commission correctly notes that the modifications will promote public understanding of the renewal process. By conforming renewal filing dates, licensees in most instances will give local public notice concurrently of the filing of the renewal applications for the translator and the primary station being rebroadcast. Thus, the proposed changes may help alleviate unnecessary confusion over the licensing process.

Finally, CVETC has read the Comments prepared by Minnesota Public Radio and supports its proposed clarification to permit licensees to file for renewal of

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<sup>4</sup> CVETC notes that the modifications proposed in the Notice are likely to have the same positive impact as the rules changes made in 1981 to facilitate the renewal of broadcast auxiliary licenses, which substantially reduced the administrative burdens on licensees and the Commission. Radio Broadcast Services: Revision of Applications for Renewal of License of Commercial and Noncommercial AM, FM and Television Licensees, 49 R.R.2d 740 (1981).

translators under one form, despite the fact that the translators may not be rebroadcasting the signal of the full power station on whose renewal application they are listed.<sup>5</sup> For example, a licensee that operates a state-wide network, such as CVETC, could file to renew its translators under the renewal application for the "flagship" station that supplies all or most of the programming to the network. CVETC agrees that such a modification would serve the public interest by reducing costs to licensees while preserving the public's access to information regarding license renewals.

### III. Conclusion

CVETC applauds the Commission's efforts to reduce the cost and burden of renewing translator licenses, and urges the Commission to adopt its proposal, as clarified above, to

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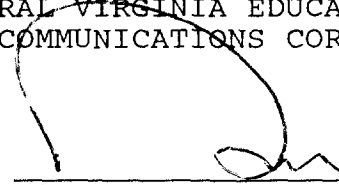
<sup>5</sup> See Comments of Minnesota Public Radio, MM Docket No. 92-168, at 4-5.

coordinate renewal filing dates for translators and full power stations in the same state and to combine the filings in one form.

Respectfully submitted,

CENTRAL VIRGINIA EDUCATIONAL  
TELECOMMUNICATIONS CORPORATION

By:



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